

From: [Miller, Gary](#)
To: [Foster, Anne](#); [Andrews, Lawrence](#)
Cc: [Sanchez, Carlos](#)
Subject: RE: Draft Gulfco CD
Date: Thursday, April 11, 2013 5:01:13 PM
Attachments: [Gulfco SOW 4-10-2013.docx](#)

Anne, Larry

The draft Gulfco SOW is attached - please look this over & lets discuss everything next week.

Thanks,

Gary

From: Foster, Anne
Sent: Wednesday, March 13, 2013 2:42 PM
To: Andrews, Lawrence; Miller, Gary
Subject: Draft Gulfco CD

Hi Gary and Larry:

Attached is the draft Gulfco CD. I originally took out the references to Remedial Action, but implementing the institutional controls (as opposed to longterm enforcing) is technically a Remedial Action. The stuff I put in orange relates to Remedial Action/Performance Standards more for my reference than anything else (I'll change that before it goes to DOJ). The stuff in blue is for the State; it's negotiated (with the State on Malone) language on institutional controls. I think it would be good to have whether they are a party to the CD or not. I called Christa McLintock to confirm the state's interest in the CD, but she's away this week. The paragraph references are all mixed up – I will fix that later.

Gary, I was most uncertain about Paragraph 11. What work plans do we want? The model provides for an institutional control plan or ICIAP, and I assume we want an O & M plan, but what other stuff do we really need? I copied down some parts of plans from the model RD/RA CD, but please feel free to come up with a better way. Please also look at Paragraph 13(a), regarding the scope of the remedy; Section IX, Access and Institutional Controls (the CD calls for a general list of actions we're trying to prohibit/control), and Sections X and XI (regarding reporting requirements). Under the definition of ICIAP in the Definitions section, there is a paragraph about the ICIAP to be inserted in the SOW, if you think that's useful.

Larry, the Payment of Response Costs is all yours (if you want it). I can copy payment addresses and stuff like that from the Malone CD, if you find that there have been no changes in the last year or so. The main thing we need is the cost summary (maybe you sent it and I missed it).

I used the model as I got it in 2009, which is in wordperfect. I hope you can still work with it.

Thank you.